

APPENDIX A

ELIGIBLE COMMUNITY DEVELOPMENT BLOCK GRANT ACTIVITIES

Activities eligible for assistance with Massachusetts Community Block Grant Program funds are only those listed below. (In all cases, unless otherwise noted, “this title” or “Title I” refers to Title I of the Housing and Community Development Act of 1974, as amended.)

1. The acquisition of real property, (including air rights, water rights, and other interests therein) which is: (a) blighted, deteriorated, deteriorating, undeveloped, or inappropriately developed from the standpoint of sound community development and growth; (b) appropriate for rehabilitation or conservation activities; (c) appropriate for the preservation or restoration of historic sites, the beautification of urban land, the conservation of open spaces, natural resources, and scenic areas, the provision of recreational opportunities, or the guidance of urban development; (d) to be used for the provision of public works, facilities, and improvements eligible for assistance under Title I; or (e) to be used for other public purposes;
2. the acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation that promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements;
3. code enforcement in deteriorated or deteriorating areas in which such enforcement, together with public or private improvements or services to be provided, may be expected to arrest the decline of the area;
4. clearance, demolition, removal, reconstruction and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately-owned properties and including the renovation of closed school buildings);
5. special projects directed to the removal of material and architectural barriers which restrict the mobility and accessibility of elderly and handicapped persons;
6. payments to housing owners for losses of rental income incurred in holding for temporary periods housing units to be utilized for the relocation of individuals and families displaced by activities under this title;
7. disposition (through sale, lease, donation, or otherwise) of any real property acquired pursuant to Title I, or its retention for public purposes;
8. provisions of public services, including but not limited to those concerned with employment, crime prevention, child care, health, drug abuse, education, energy

conservation, welfare or recreation needs, if such services have not been provided by the unit of general local government (through funds raised by such unit, or

received by such unit from the state in which it is located) during any part of the twelve-month period immediately preceding the date of submission of the Statement with respect to which funds are to be made available under Title I, and which are to be used for such services, unless the Secretary finds that the discontinuation of such services was the result of events not within the control of the unit of general local government, except that not more than 15 percent of the amount of any assistance to a unit of general local government (or in the case of non entitled communities not more than 15 percent statewide) under this title including program income may be used for activities under this paragraph unless such unit of general local government used more than 15 percent of the assistance received under this title for fiscal year 1982 or fiscal year 1983 for such activities (excluding any assistance received pursuant to Public Law 98-8), in which case such unit of general local government may use not more than the percentage or amount of such assistance used for such activities for such fiscal year, whichever method of calculation yields the higher amount, and except that of any amount of assistance under this title (including program income) in each of the fiscal years 1993 through 1998 to the City of Los Angeles and County of Los Angeles, each such unit of general government may not use more than 25 percent in each such fiscal year for activities under this paragraph;

9. payment of the non-federal share required in connection with a federal grant-in-aid program undertaken as part of activities assisted under Title I;
10. payment of the cost of completing a project funded under Title I of the Housing Act of 1949;
11. relocation payments and assistance for displaced individuals, families, businesses, organizations, and farm operations, when determined by the grantee to be appropriate;
12. activities necessary to: (a) develop a comprehensive community development plan; and (b) to develop a policy-planning-management capacity so that the recipient of assistance under this title may more rationally and effectively (i) determine its needs, (ii) set long-term goals and short-term objectives, (iii) devise programs and activities to meet these goals and objectives, (iv) evaluate the progress of such programs in accomplishing these goals and objectives, and (v) carry out management, coordination, and monitoring of activities necessary for effective planning and implementation;
13. payment of reasonable administrative costs related to establishing and administering federally approved enterprise zones and payment of reasonable administrative costs and carrying charges related to: (a) administering the HOME program under title II of the Cranston-Gonzalez National Affordable Housing Act; and (b) the planning and execution of community development and housing activities, including the provision of information and resources to residents of areas in which community development and housing activities are to be concentrated with respect to the planning and execution of such activities, and including the carrying-out of activities as described in section 701(e) of the Housing Act of 1954 on the date prior to the date of enactment of the Housing and Community Development Amendments of 1981;

14. provisions of assistance including loans (both interim and long term) and grants for activities which are carried out by public or private non-profit entities, including: (a) acquisition of real property; (b) acquisition, construction, reconstruction, rehabilitation, or installation of (i) public facilities (except for buildings for the general conduct of government), site improvements, and utilities, and (ii) commercial or industrial buildings or structures or other commercial and industrial real property improvements; and (c) planning;
15. assistance to neighborhood-based nonprofit organizations, local development corporations, nonprofit organizations serving the development needs of the communities in non-entitlement areas, or entities organized under section 301(d) of the Small Business Investment Act of 1958 to carry out a neighborhood revitalization or community economic development or energy conservation project in furtherance of the objectives of section 101(c), and assistance to neighborhood-based nonprofit organizations, or other private or public nonprofit organizations, for the purpose of assisting, as part of neighborhood revitalization or other community development, the development of shared housing opportunities (other than by construction of new facilities) in which elderly families (as defined in section 3(b)(3) of the United States Housing Act of 1937) benefit as a result of living in a dwelling in which the facilities are shared with others in a manner that effectively and efficiently meets the housing needs of the residents and thereby reduces their cost of housing;
16. activities necessary to the development of energy use strategies related to recipient's development goals, to assure that those goals are achieved with maximum energy efficiency, including items such as: (a) an analysis of the manner in, and the extent to, which energy conservation objectives will be integrated into local government operations, purchasing and service delivery, capital improvements budgeting, waste management, district hearing and cooling, land use planning and zoning, and traffic control, parking, and public transportation functions; and (b) a statement of the actions the recipient will take to foster energy conservation and the use of renewable energy resources in the private sector, including the enactment and enforcement of local codes and ordinances to encourage or mandate energy conservation or use of renewable energy resources, financial and other assistance to be provided (principally for the benefit of low- and moderate-income persons) to make energy conserving improvements to residential structures, and any other proposed energy conservation activities;
17. provision of assistance to private, for-profit entities, when the assistance is appropriate to carry-out an economic development project (that shall minimize, to the extent practicable, displacement of existing businesses and jobs in neighborhoods) that: (a) creates or retains jobs for low- and moderate-income persons; (b) prevents or eliminates slums and blight; (c) meets urgent needs; (d) creates or retains businesses owned by community residents; (e) assists businesses that provide goods or services needed by, and affordable to, low- and moderate-income residents; or (f) provides technical assistance to promote any of the activities under subparagraphs (a) through (e);
18. the rehabilitation or development of housing assisted under Section 17 of the United States Housing Act of 1937;

19. provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities, which assistance shall not be considered a planning cost as defined in paragraph (12) or administrative costs as defined in paragraph (13);
20. housing services, such as housing counseling, in connection with tenant-based rental assistance and affordable housing projects assisted under title II of the Cranston-Gonzalez National Affordable Housing Act, energy auditing, preparation of work specifications, loan processing, inspections, tenant selection, management of tenant-based-rental assistance, and other services related to assisting owners, tenants, contractors, and other entities, participating or seeking to participate in housing activities assisted under title II of the Cranston-Gonzalez National Affordable Housing Act;
21. provisions of assistance by recipients under this title to institutions of higher education having a demonstrated capacity to carry out eligible activities under this subsection for carrying out such activities;
22. provision of assistance to public and private organizations, agencies, and other entities (including nonprofit and for-profit entities) to enable such entities to facilitate economic development by (a) providing credit (including providing direct loans and loan guarantees, establishing revolving loan funds, and facilitating peer lending programs) for the establishment, stabilization, and expansion of micro enterprises; (b) providing technical assistance, advice, and business support services (including assistance, advice and support relating to developing business plans, securing funding, conducting marketing, and otherwise engaging in micro enterprise activities) to owners of micro enterprises and persons developing micro enterprises; and (c) providing general support (such as peer support programs and counseling) to owners of micro-enterprises and persons developing micro enterprises;
23. activities necessary to make essential repairs and to pay operating expenses necessary to maintain the habitability of housing units acquired through tax foreclosure proceedings in order to prevent abandonment and deterioration of such housing in primarily low- and moderate-income neighborhoods;
24. provision of direct assistance to facilitate and expand homeownership among persons of low- and moderate-income (except that such assistance shall not be considered a public service for purposes of paragraph (8)) by using such assistance to: (a) subsidize interest rates and mortgage principal amounts for low- and moderate-income homebuyers; (b) finance the acquisition by low- and moderate-income homebuyers of housing that is occupied by the homebuyers; (c) acquire guarantees for mortgage financing obtained by low- and moderate-income homebuyers from private lenders (except that amounts received under this title may not be used under this subparagraph to directly guarantee such mortgage financing and grantees under this title may not directly provide such guarantees); (d) provide up to 50 percent of any down payment required from low- or moderate-income homebuyer; or (e) pay reasonable closing costs (normally

associated with the purchase of a home) incurred by low- or moderate-income homebuyers; and

25. lead-based paint hazard evaluation and reduction, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, as implemented by regulations at 24 C.F.R. Part 35.

In accordance with federal regulations, no activity listed as eligible under section 105(a) of the Housing and Community Development Act of 1974 (as amended) will be specifically excluded from any component of the Massachusetts Community Block Grant Program.

STATE NAME – MA

TOTAL POP
(HUD)LOW-MOD
POPLOW-MOD
PERCENT**APPENDIX B****HUD LOW-MOD DATA (City- and Town-Wide
Only)****2000 CENSUS LOW-MOD DATA**

MUNICIPALITY	TOTAL POP (HUD)	LOW-MOD POP	LOW-MOD PERCENT
Abington town	14,414	4,753	33.0
Acton town	20,189	3,457	17.1
Acushnet town	10,150	3,292	32.4
Adams town	8,788	4,604	52.4
Agawam town	27,418	8,411	30.7
Alford town	393	95	24.2
Amesbury town	16,042	6,322	39.4
Amherst town	22,423	9,858	44.0
Andover town	30,944	6,352	20.5
Aquinnah	364	174	47.8
Ashburnham town	5,528	1,597	28.9
Ashby town	2,831	794	28.0
Ashfield town	1,801	518	28.8
Ashland town	14,642	3,940	26.9
Athol town	11,052	5,989	54.2
Auburn town	15,755	5,496	34.9
Avon town	4,443	1,767	39.8
Ayer town	6,833	2,751	40.3
Barre town	5,086	1,956	38.5
Becket town	1,726	641	37.1
Bedford town	12,011	1,940	16.2
Belchertown town	12,952	3,977	30.7
Bellingham town	15,297	4,514	29.5
Belmont town	23,883	5,120	21.4
Berkley town	5,735	1,703	29.7
Berlin town	2,372	731	30.8
Bernardston town	2,134	813	38.1
Beverly city	37,693	13,354	35.4
Billerica town	37,725	10,460	27.7
Blackstone town	8,773	3,365	38.4
Blandford town	1,214	364	30.0
Bolton town	4,148	635	15.3
Bourne town	17,765	7,416	41.7
Boxborough town	4,868	760	15.6
Boxford town	7,921	891	11.2
Boylston town	4,008	1,034	25.8
Braintree town	33,018	10,146	30.7
Brewster town	9,638	3,421	35.5
Bridgewater town	21,114	5,818	27.6
Brimfield town	3,339	1,276	38.2
Brookfield town	3,051	1,230	40.3

STATE NAME – MA	TOTAL POP (HUD)	LOW-MOD POP	LOW-MOD PERCENT
Buckland town	1,990	705	35.4
Burlington town	22,839	5,428	23.8
Canton town	20,334	5,175	25.4
Carlisle town	4,717	744	15.8
Carver town	11,152	4,172	37.4
Charlemont town	1,352	573	42.4
Charlton town	11,063	3,104	28.1
Chatham town	6,349	2,361	37.2
Chelmsford town	33,379	8,434	25.3
Chelsea city	34,134	23,915	70.1
Cheshire town	3,401	1,335	39.3
Chester town	1,306	625	47.9
Chesterfield town	1,201	505	42.0
Chilmark town	828	307	37.1
Clarksburg town	1,680	672	40.0
Clinton town	13,307	6,028	45.3
Cohasset town	7,192	1,487	20.7
Colrain town	1,799	838	46.6
Concord town	15,572	2,503	16.1
Conway town	1,807	423	23.4
Cummington town	889	388	43.6
Dalton town	6,779	2,227	32.9
Danvers town	24,194	7,901	32.7
Dartmouth town	27,390	8,820	32.2
Dedham town	22,626	7,175	31.7
Deerfield town	4,736	1,300	27.4
Dennis town	15,829	6,635	41.9
Dighton town	6,120	1,932	31.6
Douglas town	7,045	1,872	26.6
Dover town	5,558	620	11.2
Dracut town	28,523	9,463	33.2
Dudley town	9,599	3,822	39.8
Dunstable town	2,829	468	16.5
Duxbury town	14,099	2,073	14.7
East Bridgewater town	12,792	4,049	31.7
East Brookfield town	2,097	753	35.9
East Longmeadow town	13,891	3,394	24.4
Eastham town	5,380	2,254	41.9
Easthampton town	15,950	5,901	37.0
Easton town	20,488	4,933	24.1
Edgartown town	3,715	1,457	39.2
Egremont town	1,347	410	30.4
Erving town	1,464	647	44.2
Essex town	3,267	1,023	31.3
Everett city	37,806	20,016	52.9
Fairhaven town	15,784	6,444	40.8
Falmouth town	31,824	11,588	36.4
Florida town	689	290	42.1
Foxborough town	16,148	4,279	26.5

STATE NAME – MA	TOTAL POP (HUD)	LOW-MOD POP	LOW-MOD PERCENT
Franklin town	28,928	6,951	24.0
Freetown town	8,349	1,889	22.6
Gardner city	19,487	8,973	46.0
Georgetown town	7,359	1,770	24.1
Gill town	1,359	433	31.9
Goshen town	903	312	34.6
Gosnold town	81	59	72.8
Grafton town	14,450	4,651	32.2
Granby town	6,085	1,770	29.1
Granville town	1,520	484	31.8
Great Barrington town	6,865	2,512	36.6
Greenfield town	17,359	8,661	49.9
Groton town	9,471	1,955	20.6
Groveland town	6,038	1,629	27.0
Hadley town	4,644	1,480	31.9
Halifax town	7,500	2,328	31.0
Hamilton town	7,655	1,883	24.6
Hampden town	5,085	1,138	22.4
Hancock town	720	258	35.8
Hanover town	13,135	2,904	22.1
Hanson town	9,469	2,618	27.6
Hardwick town	2,562	983	38.4
Harvard town	5,171	745	14.4
Harwich town	12,050	5,038	41.8
Hatfield town	3,249	1,004	30.9
Hawley town	331	140	42.3
Heath town	819	311	38.0
Hingham town	19,560	4,019	20.5
Hinsdale town	1,872	786	42.0
Holbrook town	10,694	3,970	37.1
Holden town	15,476	3,968	25.6
Holland town	2,407	886	36.8
Holliston town	13,760	2,975	21.6
Hopedale town	5,776	1,763	30.5
Hopkinton town	13,196	2,168	16.4
Hubbardston town	3,887	866	22.3
Hudson town	17,986	6,117	34.0
Hull town	11,017	4,418	40.1
Huntington town	2,192	763	34.8
Ipswich town	12,787	4,225	33.0
Kingston town	11,492	4,054	35.3
Lakeville town	9,574	2,255	23.6
Lancaster town	5,724	2,012	35.2
Lanesborough town	2,980	1,016	34.1
Lee town	5,834	2,480	42.5
Leicester town	10,075	3,449	34.2
Lenox town	4,802	1,594	33.2
Leverett town	1,629	456	28.0
Lexington town	29,571	5,085	17.2

STATE NAME – MA	TOTAL POP (HUD)	LOW-MOD POP	LOW-MOD PERCENT
Leyden town	770	205	26.6
Lincoln town	7,903	1,951	24.7
Littleton town	8,065	2,105	26.1
Longmeadow town	15,240	2,474	16.2
Ludlow town	19,517	6,998	35.9
Lunenburg town	9,398	2,577	27.4
Lynnfield town	11,530	2,263	19.6
Manchester town	5,209	1,337	25.7
Mansfield town	22,362	6,022	26.9
Marblehead town	20,246	4,584	22.6
Marion town	5,019	1,387	27.6
Marlborough city	35,765	12,246	34.2
Marshfield town	24,274	6,760	27.8
Mashpee town	12,817	4,348	33.9
Mattapoisett town	6,229	1,721	27.6
Maynard town	10,421	3,394	32.6
Medfield town	12,097	1,897	15.7
Medway town	12,337	2,566	20.8
Melrose city	26,806	7,345	27.4
Mendon town	5,270	1,463	27.8
Merrimac town	6,103	2,214	36.3
Methuen town	43,308	18,255	42.2
Middleborough town	19,409	7,595	39.1
Middlefield town	580	251	43.3
Middleton town	6,347	1,512	23.8
Milford town	26,475	10,730	40.5
Millbury town	12,444	4,590	36.9
Millis town	7,866	2,126	27.0
Millville town	2,723	960	35.3
Milton town	25,017	5,883	23.5
Monroe town	55	39	70.9
Monson town	8,127	2,405	29.6
Montague town	8,345	4,293	51.4
Monterey town	851	276	32.4
Montgomery town	656	154	23.5
Mount Washington town	134	37	27.6
Nahant town	3,576	978	27.3
Nantucket town	8,760	3,995	45.6
Natick town	31,629	7,386	23.4
Needham town	27,947	4,936	17.7
New Ashford town	232	61	26.3
New Braintree town	927	246	26.5
New Marlborough town	1,405	495	35.2
New Salem town	929	288	31.0
Newbury town	6,680	1,606	24.0
Newburyport city	16,861	5,390	32.0
Norfolk town	8,698	1,292	14.9
North Adams city	13,926	8,108	58.2
North Andover town	25,330	6,402	25.3

STATE NAME – MA	TOTAL POP (HUD)	LOW-MOD POP	LOW-MOD PERCENT
North Attleborough town	26,991	8,322	30.8
North Brookfield town	4,621	2,030	43.9
North Reading town	13,713	3,014	22.0
Northborough town	13,883	2,994	21.6
Northbridge town	12,807	4,805	37.5
Northfield town	2,935	991	33.8
Norton town	16,387	4,721	28.8
Norwell town	9,555	2,083	21.8
Norwood town	28,021	9,040	32.3
Oak Bluffs town	3,697	1,505	40.7
Oakham town	1,673	496	29.6
Orange town	7,494	3,710	49.5
Orleans town	6,136	2,322	37.8
Otis town	1,354	440	32.5
Oxford town	13,266	5,000	37.7
Palmer town	12,425	5,301	42.7
Paxton town	3,987	884	22.2
Peabody city	47,407	16,883	35.6
Pelham town	1,403	413	29.4
Pembroke town	16,802	4,898	29.2
Pepperell town	11,137	3,280	29.5
Peru town	801	321	40.1
Petersham town	1,087	366	33.7
Phillipston town	1,621	603	37.2
Plainfield town	576	295	51.2
Plainville town	7,626	2,589	33.9
Plympton town	2,637	640	24.3
Princeton town	3,352	592	17.7
Provincetown town	3,102	1,710	55.1
Randolph town	30,721	11,288	36.7
Raynham town	11,581	3,424	29.6
Reading town	23,545	5,072	21.5
Rehoboth town	10,172	3,057	30.1
Revere city	46,967	26,593	56.6
Richmond town	1,609	414	25.7
Rochester town	4,577	1,049	22.9
Rockland town	17,477	7,241	41.4
Rockport town	7,690	2,879	37.4
Rowe town	361	131	36.3
Rowley town	5,427	1,507	27.8
Royalston town	1,253	507	40.5
Russell town	1,655	682	41.2
Rutland town	6,231	1,611	25.9
Salisbury town	7,788	3,456	44.4
Sandisfield town	780	234	30.0
Sandwich town	19,980	5,084	25.4
Saugus town	25,792	9,107	35.3
Savoy town	689	282	40.9
Scituate town	17,694	4,052	22.9

STATE NAME – MA	TOTAL POP (HUD)	LOW-MOD POP	LOW-MOD PERCENT
Seekonk town	13,423	4,538	33.8
Sharon town	17,334	3,273	18.9
Sheffield town	3,321	1,236	37.2
Shelburne town	1,925	799	41.5
Sherborn town	4,200	545	13.0
Shirley town	5,275	1,783	33.8
Shrewsbury town	31,464	8,354	26.6
Shutesbury town	1,801	514	28.5
Somerset town	17,950	6,489	36.2
South Hadley town	15,364	5,125	33.4
Southampton town	5,387	1,249	23.2
Southborough town	8,753	1,494	17.1
Southbridge town	17,035	9,735	57.1
Southwick town	8,821	2,645	30.0
Spencer town	11,579	4,928	42.6
Sterling town	7,256	1,474	20.3
Stockbridge town	2,046	631	30.8
Stoneham town	21,932	7,473	34.1
Stoughton town	26,687	9,176	34.4
Stow town	5,874	1,032	17.6
Sturbridge town	7,824	2,690	34.4
Sudbury town	16,649	2,379	14.3
Sunderland town	3,725	1,639	44.0
Sutton town	8,244	1,911	23.2
Swampscott town	14,163	3,577	25.3
Swansea town	15,697	5,700	36.3
Templeton town	6,526	2,499	38.3
Tewksbury town	28,069	7,439	26.5
Tisbury town	3,644	1,695	46.5
Tolland town	428	144	33.6
Topsfield town	6,023	1,014	16.8
Townsend town	9,203	2,792	30.3
Truro town	1,978	854	43.2
Tyngsborough town	11,071	3,115	28.1
Tyringham town	343	68	19.8
Upton town	5,598	1,349	24.1
Uxbridge town	11,124	3,338	30.0
Wakefield town	24,561	6,807	27.7
Wales town	1,737	743	42.8
Walpole town	21,887	5,285	24.1
Ware town	9,707	4,629	47.7
Wareham town	20,036	11,147	55.6
Warren town	4,768	2,589	54.3
Warwick town	753	365	48.5
Washington town	548	187	34.1
Watertown town	31,739	10,865	34.2
Wayland town	12,940	2,293	17.7
Webster town	16,148	8,299	51.4
Wellesley town	23,162	3,509	15.1

STATE NAME – MA	TOTAL POP (HUD)	LOW-MOD POP	LOW-MOD PERCENT
Wellfleet town	2,748	1,094	39.8
Wendell town	893	307	34.4
Wenham town	3,469	702	20.2
West Boylston town	6,147	1,897	30.9
West Bridgewater town	6,507	2,220	34.1
West Brookfield town	3,448	1,310	38.0
West Newbury town	4,144	687	16.6
West Springfield town	27,519	11,965	43.5
West Stockbridge town	1,414	442	31.3
West Tisbury town	2,466	653	26.5
Westborough town	17,136	3,470	20.2
Westford town	20,649	3,222	15.6
Westhampton town	1,468	423	28.8
Westminster town	6,903	1,821	26.4
Weston town	10,619	1,178	11.1
Westport town	14,137	4,865	34.4
Westwood town	13,975	2,644	18.9
Whately town	1,563	431	27.6
Whitman town	13,838	5,184	37.5
Wilbraham town	13,245	3,061	23.1
Williamsburg town	2,427	745	30.7
Williamstown town	6,087	1,966	32.3
Wilmington town	21,109	5,166	24.5
Winchendon town	9,482	4,027	42.5
Winchester town	20,425	3,351	16.4
Windsor town	895	321	35.9
Winthrop town	18,060	6,480	35.9
Woburn city	37,014	13,017	35.2
Worthington town	1,219	468	38.4
Wrentham town	9,815	1,962	20.0

APPENDIX C

HUD SURVEY METHODOLOGY

TO DETERMINE LOW/MODERATE STATUS OF CDBG SERVICE AREAS

HUD has developed the attached suggested procedures for conducting a survey to ascertain whether or not a CDBG funded activity designed to benefit an area generally qualifies as benefiting low- and moderate-income persons. A valid survey is no older than three years. If a survey is between three and five years old, DHCD will consider the survey if the applicant demonstrates that the surveyed households have not changed and that additional residences have not been added to the area.

These procedures represent a reasoned approach to conducting surveys. HUD has attempted to make the procedures as simple and least costly as possible, while at the same time ensuring that the majority of persons in an area are low- and moderate-income.

Please share this with all CDBG grantees, especially the State CDBG grantees. Urge them to use this, or comparable methodologies when conducting surveys to determine the income status of a service area. If surveys do not meet these general standards, then you should ask the State to demonstrate why it believes its survey is adequate and why the results qualify the area as a predominantly low- and moderate-income area. Entitlement cities are encouraged to have the survey instruments and methodology reviewed and approved by EMAD prior to conducting a survey, as is the current practice.

SUGGESTED PROCEDURES FOR CONDUCTING A SAMPLE SURVEY TO DETERMINE WHETHER THE MAJORITY OF PERSONS IN A TARGET AREA HAVE LOW- AND MODERATE-INCOMES

INTRODUCTION

This document was prepared by Community Planning and Development's Office of Program Analysis and Evaluation to assist staff in HUD's Field Offices, in States, and in localities to develop methods to determine whether a geographic area will meet CDBG program requirements related to low- and moderate-income benefit. In this paper, we assume that State or local CDBG staff without substantial research background will use survey research techniques to make this determination, and we identify the basic techniques to make this determination, and we identify the basic techniques for conducting a sample survey that will yield acceptable levels of accuracy.

The purpose of a sample survey is to ask questions of a portion of the population in order to make estimates about the entire population. If we ask proper questions of a randomly-drawn sample of adequate size, we can be reasonably sure of the degree of accuracy of our overall estimates. In the survey that is discussed here, we are seeking to determine one thing -- whether at least 51 percent of the persons living in a target area have low- and moderate-incomes.

The remainder of this paper is divided into six major sections, each of which discusses a different major step in administering the survey. In order to obtain accurate results, it is necessary to complete each step properly. You must ask the right questions of the right people and interpret their answers correctly.

While this paper is to assist people without a background survey research in conducting a successful survey of income, we would recommend trying to locate a source of experienced guidance before proceeding. For example, if there is a local college, a professor might be persuaded to conduct the survey as part of a course. At a minimum, perhaps such an individual or someone with a social science background in a county or area-wide planning office will be willing to comment and make recommendations on key parts of your procedures.

STEP 1: SELECTING THE TYPE OF SURVEY

Any type of survey that fulfills the criteria discussed below can be used to determine whether an area qualifies as low- and moderate-income. The most commonly used surveys for this application are: (a) telephone surveys; (b) door-to-door surveys; and (c) mail surveys.

Telephone surveys are relatively easy to conduct. An interviewer just needs to call up, identify the head of the household or someone competent and knowledgeable enough to answer for the head of household, and proceed with the interview. However, the steps that must be taken before you remake the point of telephoning may prove difficult. In a telephone survey, you must acquire the telephone numbers of all the households in your target area and devise a method for contacting households without telephones or those with unlisted numbers. It may be preferable to sample door-to-door in small target areas, such as a neighborhood or small town, where it may be difficult to find a list of telephone numbers that identifies everyone in the area while excluding everyone outside the area.

Door-to-door-surveys involve a little more work--the interviewers must actually go outside, knock on doors, and do the "leg work" necessary to obtain interviews. However, in small areas this type of survey may be the easiest because you can define the target area by its geographic boundaries and develop procedures for sampling within those boundaries so that no list of the households in the area is needed beforehand.

Mail surveys may be the easiest of all. You need a list of all the addresses in the target area, a questionnaire, and postage. However, mail surveys usually yield a very low rate of response, which means, a low degree of accuracy. Also, provisions must be made to provide non-English-Speaking residents with a questionnaire in their own language. Thus, for estimating low- and moderate-income benefit, we do not recommend this type of procedure, unless you include in your mailing a stamped self-addressed return envelope and count on

doing at least one follow-up letter or telephone call to encourage everyone to respond.

Of course, it is possible, and sometimes quite useful, to combine these types of surveys. For example, in a door-to-door survey you find that someone is not home, you can leave a note for them to telephone the interviewer. Or you can use the telephone to schedule a time when an interviewer will call at the door to conduct an interview. Similarly, you can mail a letter to residents of the target area to let them know in advance when an interviewer will call or visit.

STEP 2: DEVELOPING A QUESTIONNAIRE

It is important that all of the individuals interviewed are asked exactly the same questions and that their responses are recorded correctly. To ensure this, you need a written questionnaire, and you need to have your interviewers write down on each questionnaire the exact responses of each respondent. Each question should be clear, written in simple language, and convey only one meaning. It is usually best to test a draft questionnaire on a few people to ensure that they understand the questions as you think you are writing them.

The central question in this survey is whether the household being interviewed has an income that is below the low- and moderate-income level for households of the same size. We recommend in door-to-door interviewing that the interviewers carry with them a set of cards, one card each for the household sizes to be considered. On each card should be written the figure for the low- and moderate-income level for a household of that size. For example:

TABLE A Illustration of Income Cards

Card Number	Persons in Household	Low/Mod Income Level
1	1	\$19,800
2	2	\$22,650
3	3	\$25,450
4	4	\$28,300
5	5	\$30,050
6	6	\$31,850
7	7	\$33,600
8	8	\$35,400

In proceeding, the interviewer first should make contact with someone who is qualified to speak for the household. After making contact with the head of the household, the spouse of the head of the household, or someone in the households who is mature and knowledgeable about household income, the interviewer should introduce him/herself, identify the purpose of the study, and solicit the participation of the respondent.

An adequate questionnaire must be able to provide answers to following two questions:

1. How many people live in your home? (Record number)
2. (If the interview is being conducted in person, the interviewer then finds the card for the household size of the respondent, and hands it to the respondent, and asks) Would you tell me whether, during the past twelve months, the total income of all members of your household was above or below the figure noted on this card? (Record Above or Below). Note that the interviewer should be prepared to provide a consistent answer to the question, "What Should I Include As Income?"

If the interview is being conducted by telephone, a card obviously cannot be used, and the interviewer should make reference to the income level that is the threshold for a household of the size of the respondent's. For example, if there are three persons in the respondent's household you might ask, "during the last 12 months, was the total income of your household less than or more than \$25,450?"

While the necessary questions are brief and simple, there are some additional factors to take into account when designing this questionnaire. First, the questions used in the survey cannot be "loaded" or biased. In this particular case, the interviewer may not imply that the neighborhood will benefit or receive Federal funding if respondents say that they have low incomes. The questions must be designed to determine truthfully and accurately whether respondents have low- and moderate-incomes. It is essential to support an application for funding under the State CDBG program or to undertake a CDBG funded activity in the area.

Second, you should bear in mind that questions about income are rather personal. Many people are suspicious or reluctant to answer questions about their incomes--especially if they do not see the reason for the questions. A good way to handle this problem is usually to put questions about income at the end of a somewhat longer questionnaire on other community development matters. In this instance, a local agency can use this questionnaire to gather some information on what the neighborhood sees as important needs or to gather feedback on some policy or project. At the end of such a questionnaire, it usually is possible to ask questions on income more discreetly. If this option is chosen, however, the interviewer should be cautioned that an excessively lengthy questionnaire may cause respondents to lose interest before it is over. The ideal length here would probably be less than ten minutes, although certainly you could develop an even longer questionnaire if it were necessary. Of course, it is possible to ask only the critical questions on income. You should know best how people in your community would respond to such questions. With a proper introduction that identifies the need for the information, you can generate an adequate level of response with just a two-question questionnaire on income level.

STEP 3: SELECTING THE PEOPLE

In selecting a sample of households to interview so that you can estimate the proportion of all individuals who have low- and moderate-incomes, there is a series

of steps that must be taken. First you must define the group whose characteristics you are trying to estimate. Then you must determine how many households in that group must be sampled in order to estimate the overall characteristics accurately. Next you must make some allowances for households who, for whatever reason, you will not be able to interview. And finally, you must actually select the households where you will try to obtain interviews. This section discusses each of these steps.

Defining the Universe: In sampling, the large group whose characteristics you seek to estimate from a sample is known as the universe. If you are trying to determine the proportion of households in a neighborhood with low- and moderate-incomes, that neighborhood is a universe. Instead of a neighborhood, the universe may be a town, it may be as large as a county, or it may be defined some other way. (For purposes of the CDBG program, your universe will be the area that is to be served by a CDBG-funded project). But before you can draw a sample, you must clearly define what area you want the sample to represent. Let us assume here that the universe is a neighborhood that contains about 400 homes. You will sample from the 400 households residing here so that you may make estimates about the incomes of all the residents of these households.

When you have defined your universe, you next need a method of identifying the individual members of that area so that you can sample them. Ideally, for a given neighborhood, you would have a list of every person living in the neighborhood and perhaps their telephone numbers. Then you would devise a procedure to select randomly the persons you wanted to interview. In reality, you will not have such a list available and you probably will not even have a list of all of the households in the neighborhood, so you will have to improvise a little. One way would be to go the neighborhood and randomly select which homes to go for an interview --- the advantage of this method is that the houses are there, so you can go right to them instead of using a list. After collecting information on the various households, you then can make some estimates about the number of people in the neighborhood and their incomes.

For larger areas where travel costs are higher, it may not be practical to go door-to-door and a list of some sort may be absolutely necessary. City indexes, if available and up-to-date, usually provide the best source of household information suitable for sampling. Telephone books may be adequate, but keep in mind that you will miss people without telephones or with unlisted numbers. Also, telephone directories usually will have far more people listed than those who are in your defined universe, so you will need to work to eliminate those outside of your target area. Tax rolls are a source identifying addresses in an area, but keep in mind that they identify property owners, whereas you are interested in residents. Also, tax rolls generally identify building addresses, whereas in the case of apartment buildings, you are interested in the individual apartments. You can use tax rolls to identify addresses to go to in order to get an interview, but you cannot use them as the basis of a mail or telephone survey (unless you have access to a telephone directory that identifies telephone numbers by property address).

How big a sample? After you have defined your universe and identified a method for identifying individual households in the universe, you must next determine how many households to select. Assuming that you develop procedures whereby every household in your target area has an equal chance of being included in your sample, you can use Table B below to determine how many households you need to interview to develop a survey of acceptable accuracy.

The first column of Table B presents sizes of neighborhoods you may be interested in. The second column shows about how many households you need to interview from neighborhood of the size indicated in the first column. This paper uses the hypothetical 400 household neighborhoods to illustrate the use of this table. Looking down the column that says "Number of households in the Universe," you find 400 are covered by the "399-650" line. Reading across this line, you see that the sample size required to generate an acceptable level of accuracy is about 250. (See the attached Appendix B for a discussion of how these sample sizes were determined.)

TABLE B REQUIRED SAMPLE SIZES FOR UNIVERSES OF VARIOUS SIZES

Number of Households in the Universe	Sample Size
1 - 55	50*
56 - 63	55
64 - 70	60
71 - 77	66
78 - 87	70
88 - 99	80
100 - 115	90
116 - 138	100
139 - 153	110
154 - 180	125
181 - 238	160
239 - 308	175
309 - 398	200
399 - 650	250
651 - 1,200	300
1,201 - 2,700	350
2,701 or more	400

Unreachable and Other Non-Response. It is important to realize that the sample sizes suggested in Table B indicate the number of interviews that you need to complete, and not necessarily the size of the sample you need to draw. There is almost always a difference. No matter what you do, some households just will not be home during the time you are interviewing, some probably will refuse to be interviewed, some will terminate the interview before you finish, and some will complete the interview, but fail to provide an answer to the key question on income level. In order to be considered an adequate response, the interview must be

conducted, and you must obtain complete and accurate information on the respondent's income level. Table C suggests some of the usual rates of response to be expected by a variety of surveys.

TABLE C Expected Response Rates for Different Types of Surveys

Survey Type	Expected Rate of Response
Mail	5-50%
Mail, with letter follow-up	0-60%
Mail, with telephone follow-up	0-80%
Telephone	5-90%
Door-to-Door	5-90%

According to Table C, if you were doing a door-to-door sample to obtain 250 interviews in the 400 household neighborhoods, you should anticipate that you will need to actually try to interview between 278 and 333 households (250 divided by .75 or .9). Thus, if you were drawing a list from whom to seek interviews, one way to deal with non-response is to over sample—list about 300 households and assume you will interview 250. In door-to-door surveys, it usually is possible to replace unreachable, by trying to obtain an interview next door to the household actually sampled.

Drawing Samples. In sampling you are looking at a portion of everyone in a group and making inferences about the whole group from the portion you are looking at. For those inferences to be most accurate, everyone who is in the group should have an equal chance of being included in the sample. For example, if you are sampling from a list, using a random numbers table (DHCD can generate random number tables with instructions, if desired, please call (617) 727-7001, extension 446 or 449) will provide you with a highly random sample. In using a random numbers table, you take a list of your universe and draw from it according to the table. If, for example, the first three random numbers are 087, 384, and 102, then you would go through your universe list and take the 87th, 384th, and 102nd households to try to interview. Continue until you have achieved the desired sample size.

As indicated above, when sampling from a list, you should over sample. Then, if you encounter unreachable, you should replace them with households in the over sample list in the order they were selected. For example, if you drew a list of 300 households in an effort to obtain 250 interviews, the first household you write off as “unreachable” should be replaced by the 251st household sampled.

Achieving a purely random sample can be costly, so sometimes it is acceptable to take some shortcuts. If you do not have a list of all the households in a target area or group you are trying to measure, but you know the geographic boundaries of the target area, you might randomly select a point at which to start and proceed systematically from there. In the hypothetical 400 household neighborhoods, for example, in trying for 250 interviews, you would need to

interview every 1.6th household (400 divided by 250) to ensure that you would cover the entire neighborhood. In whole numbers, this works out to about 2 of every 3 households. Therefore, you could start at one end of the neighborhood and proceed systematically through the entire neighborhood trying two doors and then skipping one. Any households that were selected by this procedure, at which an interview was not possible, could be replaced by the next household you would have skipped. If the sample size called for you to sample one of every six households, you could draw a random number from one to six and start at that household and every sixth household after it, and replace unreachable with every third household in the six household groups.

You will achieve more accurate estimates if you are not too quick to write off a household as unreachable. You are most certain of randomness if you obtain interviews from the households you selected first. Thus, if you are doing a door-to-door survey, you probably should make two or more passes through the area (possibly at different times) to try to catch a family at home. Frequently they will be busy, but will say that they can do the interview later--you should make an appointment and return. Only after at least two tries or an outright refusal should a sampled household be replaced. With a telephone survey, at least three or four calls should be made before replacing a household.

As part of your questionnaire, or at least as part of your training of interviewers, you should develop an introduction to the actual interview. This should be a standard introduction in which the interviewers introduce themselves, identify the purpose of the survey, and request the participation of the respondent. Usually it is also a good idea to note the expected duration of the interview--in this case to let respondents know that the burden to them will be minimal.

You also should emphasize to respondents that their answers will be kept confidential--people are more likely to give you honest answers if they will remain anonymous. You should do your very best to maintain this confidentiality. Usually, the respondent's name, address, and telephone number appear only on a cover sheet. After you complete the survey, you can throw away the cover sheet or at least separate it from the actual interview. If you number both the cover sheets and the questionnaires, you can then match them up if absolutely necessary. What is important is that people will not just be able to pick up a questionnaire and see what the Jones family income is.

Interviewers also should follow the set procedures for replacing "unreachable" (as discussed above in Step 3). If they must write off an interview, they should not say "Well, I was refused an interview here, so I'll go over there where I think I can get an interview." This replacement procedure is not random and will hurt the accuracy, of your survey results.

The Interview. Interviewers should read the questions exactly as they are written. If the respondent does not understand the question or gives an unresponsive answer, it usually is best to have the interviewer just repeat the

question. Questions should be read in the order in which they are written. The respondent's answers should be recorded neatly and accurately immediately as they are provided. At the end of the interview, and before proceeding to the next interview, the interviewer should always do a quick edit of the questionnaire to be sure that they have completed every answer correctly. This simple check helps to avoid the frustrating mistake of having gone to the time and expense of conducting the interview, but without getting the information you sought.

STEP 4: CONDUCTING THE SURVEY

To carry out the survey, you have to reproduce sufficient questionnaires, recruit and train interviewers, schedule the interviewing, and develop procedures for editing, tabulating, and analyzing the results.

Publicity. To promote citizen participation in your effort it may prove worthwhile to arrange some advance notice. A notice in a local newspaper or announcements at churches or civic organizations can let people living in your target area know that you will be conducting a survey to determine area income levels. If you let people know in advance how, when, and why you will contact them, usually they are most willing to cooperate.

As with all aspects of the survey and questionnaire, any publicity must be worded so that it does not bias the results. For example, it is fine to say that the community is applying for a State CDBG grant and that, as part of the application, the community has to provide HUD and the State with current estimates of the incomes of the residents of the target neighborhood. It is not appropriate to say that, in order for the community to receive the desired funding, a survey must be conducted to show that most of the residents of the target area have low- and moderate-incomes.

Interviewers. Anyone who is willing to follow the established procedures can serve as an interviewer. It usually is not necessary to go to great expense to hire professional interviewers. Volunteers from local community groups will serve well. Also, schools or colleges in doing courses on civics, public policy, or survey research frequently may be persuaded to assist in the effort as a means of providing students with practical experience and credit.

Generally, it is best if interviewers are chosen to make the respondents feel most at home. For this reason, survey research companies often employ mature women as their interviewers. When interviewers are of the same race and social class as the respondent, the survey usually generates a better response rate and more accurate results. What is most important, though, is that the interviewer will command the attention of the respondent, ask the questions as they are write, follow respondent selection procedures, and write down the responses as given.

Contact and follow-up. Interviewers should attempt to contact respondents at a time when they are most likely to get a high rate of response from most types of people. Telephone interviews usually are conducted early in the evening, when

people are home. Door-to-door interviews also may be conducted early in the evening (especially before dark) or on weekends. You should try again at a different time to reach anyone in the initial sample who is missed by this initial effort.

In general, you should know best the residents of your community and when they can be reached. What you should avoid is selecting a time or method that will yield biased results. For example, interviewing only during the day from Monday to Friday probably will miss families where both the husband and wife work. Since these families may have higher incomes than families with only one employed member, your timing may lead to the biased result of finding an excessively high proportion of low- and moderate-income households.

Of course, in making contact with a member of the household, the interviewer first has to determine that the person being interviewed is knowledgeable and competent to answer the questions being asked. The interviewer thus should ask to speak to the head of the household or the spouse of the head of the household. If it is absolutely necessary to obtain an interview at the residence that is sampled, the interviewer may conduct an interview with other resident adults or children of at least high school age only after determining that they are mature and competent to provide accurate information.

For the survey here being discussed on low- and moderate-income benefit, note that there may be an important exception to reading the questions in the exact order every time. If you elect to include other questions, and if you place the questions on income at the end, it is possible that a willing respondent will end the interview before you get to the critical question. If it appears to the interviewer that the respondent is about to terminate the interview, it is recommended that he or she immediately try to get an answer to the critical income question.

Editing. Interviewers should turn their completed surveys in to the person who will tabulate and analyze them. That person should review each survey to ensure that it is clear and unambiguous. Questions or errors that are found should be referred to the interviewer for clarification. It also may be desirable to call back the respondent, if necessary, to clarify incomplete or ambiguous responses. Note that editing is an ongoing process. Even after you have started to tabulate or analyze the data, you may come across errors, which you need to correct.

STEP 5: DETERMINING THE RESULTS

After you have your data collected and edited, you just need to add up the numbers to see what you have learned. Actually, it is useful to think of this in two parts: (1) tabulating up the responses from the questionnaires and calculating an estimated proportion of low- and moderate-income persons; and (2) determining how accurate that estimate is. The first of these parts can be taken care of by completing the LOW- AND MODERATE-INCOME WORKSHEET, which appears below.

Tabulation. For ease of processing, it may be desirable to enter the responses onto a computer, if one is available. Personal computer packages such as Base, Lotus 1-2-3, and SPSS-PC all are easy to use in tabulating this type of data. Computers also make it relatively easy to check for accuracy and consistency in the data. However, you can perform the calculations by hand or with a calculator. And you can process the data by putting it on a code sheet, by entering it on a manual spreadsheet, or just by flipping through the completed surveys. Regardless of how you process and tabulate the data, when you are finished, you must be able to complete Part A of the LOW- AND MODERATE-INCOME WORKSHEET.

LOW- AND MODERATE-INCOME WORKSHEET

PART A. INFORMATION CONTAINED IN YOUR SURVEY

1. Enter the estimated total number of households in the target area. 1. _____
2. Enter the total number of households interviewed 2. _____
3. Enter the total number of low- and moderate-income households interviewed. 3. _____
4. Enter the total number of persons living in the low- and moderate- income households interviewed. 4. _____
5. Enter the total number of households interviewed in which the income was above the low- and moderate-income level. 5. _____
6. Enter the total number of persons living in the households in which the income was above the low- and moderate-income level. 6. _____

PART B. CALCULATIONS BASED ON DATA CONTAINED IN YOUR SURVEY

7. Divide Line 4 by Line 3. (This is the average size of the low-moderate income household you interviewed) 7. _____
8. Divide Line 6 by Line 5. (This is the average size of the non low-moderate income household you interviewed) 8. _____
9. Divide Line 3 by Line 2. (This is the proportion of households interviewed that have low- and moderate-incomes). 9. _____
10. Divide Line 5 by Line 2. (This is the proportion of households interviewed that do not have low- and moderate-incomes). 10. _____
11. Multiply Line 1 by Line 9. (This is the estimate of the total number of low-moderate-income households in your target area). 11. _____
12. Multiply Line 1 by Line 10. (This is the estimate of the total number of non-low-moderate income households in your target area. 12. _____
13. Multiply Line 7 by Line 11. (This is the estimate of the total number of low- to moderate-income persons in your target area. 13. _____
14. Multiply Line 8 by Line 12. (This is the estimate number of non-low/mod persons in your target area) 14. _____
15. Add Line 13 and Line 14. (This is the estimate of the total number of persons in your target area) 15. _____
16. Divide Line 13 by Line 15, and multiply the resulting decimal by 100. (This is the estimated percentage of persons in your target area having low- and moderate-incomes) 16. _____

PART C. Instructions and Explanations

1. The Number that goes on Line 1 is something you needed to know before drawing your sample. In the course of your survey, you may have refined your original estimate. On Line 1, you should enter your current best estimate of the total number of households in the area.
2. For the number of households interviewed, you actually want the total number of interviews with complete and, as far as you can tell, accurate information on the income and size of household questions.
3. When you are completing Part A be sure that the answers are logical. For example, the number on Line 4 cannot be smaller than the number on Line 3 (because every household must have at least one person). Similarly, the number on Line 6 cannot be less than the number on Line 5. Also note that the number on Line 3 plus the number on Line 5 should equal the number on Line 2 -- every household is either low- and moderate-income or it is not.
4. Some examples for Part B. For purposes of illustration, assume that you estimated that the target area contained 650 households (Line 1). Assume that you interviewed 250 households (Line 2), of whom 130 had low- and moderate-incomes (Line 3.) These low-moderate-income households contained 450 persons (Line 4). The 120 households with incomes above the low- and moderate-income level (Line 5) contained 400 persons (Line 6). You would complete Part D as follows:
 5. Line 7. If the households you interviewed contained 450 Low-Mod persons in 130 Households, the number on Line 7 would be about 3.46 ($450/130$).
 6. Line 8. If the households you interviewed contained 400 non-low-mod persons in 120 Households, the number on Line 8 would be about 3.33 ($400/120$).
 7. Line 9. If you interviewed a total of 250 households, 130 of which had low- and moderate-incomes, the number on Line 9 would be about .52 ($130/250$).
 8. Line 10. If 120 of the 250 households you interviewed did not have low- and moderate-incomes, the number on Line 10 would be about .48 ($120/250$).
 9. Line 11. If your target area contained an estimated 650 households, and you interviewed 250, of which 130 had low- and moderate-incomes, the number on Line 11 would be about 333 ($650 \times .52$).
 10. Line 12. Continuing with the example, Line 12 would be about 312 ($650 \times .48$).
 11. Line 13. 3.46 persons per low-mod household times 338 Low-mod households—Line 13 would be about 1,169.
 12. Line 14. 3.33 persons per non-low-mod households times 312 non-low-mod households—Line 14 would be about 1,039.

13.Line 15. Total low-mod persons (1,169) plus total non-low-mod persons (1,039)
-- Line 15 would be about 2, 208 estimated total persons.

14.Line 16. 1,169 low-mod persons divided by 2, 208 total persons yields about 52.94. Multiplied by 100, this gives an estimate that about 52.94 percent of the residents have low- and moderate-incomes.

Analysis. The estimate you reach for the proportion of residents who have low- and moderate-incomes will be just that--an estimate. If you have done everything right, including random selection of the required number of households, the estimate should be reasonably accurate. If, using the procedures specified here you come up with an estimate of 55 percent or more of the residents of the target area having low- and moderate-incomes, you can be pretty sure that at least 51 percent of the residents actually have low- and moderate-incomes. You can skip over this section, and go down to STEP 6. On the other hand, if your estimate is that less than 51 percent of the people in the area have low- and moderate-incomes, the presumption is that the area is ineligible as a target area. This section, and in fact, the remainder of this paper, probably will not be of much use to you either.

This section is intended for use by those whose survey results indicate that somewhere between 51 and 54 percent of the residents of the target area have low- and moderate-incomes. If your estimates were in the 51 to 54 percent range, it is probable that a majority of all neighborhood residents have low- and moderate-incomes, but there is less certainty than if you came up with a higher proportion. The closer your estimate is to 51 percent, the less certain you become that the area is low- and moderate-income.

There are a couple of additional analyses you can make to help determine the extent to which your estimate of the proportion of low- and moderate-income residents is correct. First, compare the average size of low- and moderate-income households in your sample with the average size of above low- and moderate-income households. The closer these figures are to each other, the more confident you can be in your estimate. Thus, if you estimate that 53 percent of the residents have low- and moderate-incomes and you found in your sample that both low- and moderate-income families and above low- and moderate-income-families had an average of 3.4 people, you can be pretty sure that it is a low- and moderate-income area.

A second simple calculation is to arrange your data into a table such as that outlined below as Table D. This table enables you to compare the distribution of family sizes of families with low- and moderate-incomes with those that are above low- and moderate-income.

In completing Table D, you would count the number of low- and moderate-income families in your survey that had just one person in the household. You would enter this figure under "Number" across from "one." You would proceed to enter the number of low- and moderate-income families with two persons, with three persons, and so forth through the nine or more category, adding up all the entries in this column, you enter the sum across from "total," which will be the total number of low- and moderate-income families from which you obtained interviews. Then, considering families that are above low- and moderate-income, you follow the same

procedures to complete the “number” column for them. For each income group, dividing the number of one person families by the total number of families in that income group and multiply it by 100, yields the percent of that group that are in one-person households. You should fill in the “percent” columns, using this procedure. Each of the percent columns should total to 100 or so allowing for rounding errors.

TABLE D
TABLE FOR COMPARING THE DISTRIBUTION OF FAMILY SIZE BY FAMILY
INCOME
Number of Persons in the Families with Low- and Moderate-Incomes
Families above Low- and Moderate-Incomes

Family	Number	Percent	Number	Percent
One				
Two				
Three				
Four				
Five				
Six				
Seven				
Eight				
Nine or More				
Totals		100%		100%

When you have filled Table D with your data, compare the percentages of the low- and moderate-income respondents with the percentages of the above low- and moderate-income respondents for each family size. The closer the distribution, the greater the degree of confidence you can have in your estimate of the proportion of persons with low- and moderate-incomes. For example, if among your low- and moderate-income group, 10 percent have one person, 40 percent have two persons, and 50 percent have three persons, and among your above low- and moderate-income group 12 percent have one person, 41 percent have two persons, and 47 percent have three persons, you would have a great deal of confidence in your estimate. Consider a best-case scenario where you estimate that 51 percent of the residents have low- and moderate-incomes. You examine the distribution of household sizes according to Table D and find that in your sample 100 percent of your low- and moderate-income group had just one person and 100 percent of your

above low- and moderate-income group had nine or more persons. (Yes, this would be a strange neighborhood.) This distribution would make it probable that your sample was badly distributed in favor of large above-lower income families and that without the sample error the actual distribution in the target area is that more than 51 percent of the residents have low- and moderate-incomes.

Third, after completing data collection, non-respondents should be briefly analyzed to determine that they were reasonably random. For example, you may want to tabulate the rate of response by street or block in the target area to see whether there are notable gaps in the coverage of your survey. You may want to examine the racial or ethnic background of your respondents and compare them with what you supposed the distribution to be. If you do not detect any major gaps in the coverage of your sample or any probable patterns in the characteristics of your non-respondents, you can be more certain of the accuracy of your estimates.

STEP 6: DOCUMENTING YOUR EFFORT

The results of your survey will indicate to you with a high degree of accuracy whether your target area is predominantly low- and moderate-income. People who may be auditing or evaluating the program may want to review the procedures and data you used to determine that your target area qualifies under the CDBG program regulations. You should therefore maintain careful documentation of the survey. The contents of that documentation are discussed here.

1. Keep the completed surveys. This will show that you actually did the survey and that you asked the proper questions.

It is best if each survey has a cover sheet that contains the information that identifies the respondent, such as name, address, and telephone number. Then, when the survey is complete, the cover sheets can be separated from the questionnaires. You can save the questionnaires as documentation of your work, but you maintain the privacy of your respondents.

If you save the cover sheets and save them separately, this provides you with a record of who was contacted. If anyone wanted subsequently to verify that you had not made up that data, they could contact some of the respondents noted on the cover sheet and ask them whether, in fact, they had been contacted on such-and-such a date by such-and-such person to discuss matters related to community development. The privacy of their original responses still is protected by this procedure.

2. Keep a list of the universe of households you sampled from and a list of the actual households sampled. This might be one list with the sampled households being checked once if they were sampled, and checked twice if they were interviewed. Replacement households should be noted too. There should be some written documentation about the method you used to select households from the list for interviewing. Note that this is a little different from keeping just the cover sheets, since it documents not just who was interviewed, but also who was not interviewed and how interviewees were selected.

3. If you did a door-to-door sample without starting from a universe list, you should have written down the procedures you used to select the sample, including instructions to interviewers for replacing sampled households who were not interviewed.

4. To the extent possible, you should retain your data. If you put the data onto a computer, keep a floppy disk with the data and programs you used to tabulate the results. If you do your tabulations from spreadsheets, retain the spreadsheets. If you just leaf through the questionnaires and count up responses and enter them into a table as you go, keep the tables with the raw data counts.

OVERVIEW OF STEPS IN A SAMPLE SURVEY

- I. Selecting the Type of Survey
 - A. Decide whether it is best to conduct a telephone, door-to-door, or other types of survey. Be sure to consider your available manpower, the size of the sample you need, and the means you have available for identifying households to interview.
- II. Developing a Questionnaire
 - A. Write your questionnaire. Remember to keep the language as simple as possible. Avoid bias--do not encourage particular answers. Include other questions, if you like, but make sure the survey does not take too long.
 - B. Develop a standard introduction for your interviewers to use in approaching the respondents.
- III. Selecting the Sample
 - A. Define your universe. What is the area or population for which you are trying to estimate the portion of persons who have low- and moderate-income.
 - B. Identify a procedure for identifying individual households in the target area. Obtain a complete list of residents, addresses, telephone numbers, or identify a procedure for selecting from all of the homes in the area.
 - C. Determine the number of interviews you need to achieve an acceptable level of accuracy.
 - D. Select your sample (or sample selection procedure). Make sure you can add households to replace refusals. Make sure that the entire universe is covered--that is, that you have not excluded certain areas or groups of people.
- IV. Conducting the Survey
 - A. Select and train your interviewers. Make sure they are very comfortable with the questionnaire. Make sure they know the importance of randomness and how to select and replace individual households.
 - B. Make contact with the sample. Write or phone and let them know you are coming. Or just knock on doors, if this is the procedure you select.

- C. Try again (and again) where contact has not re interview.
 - D. Replace households you have written off as “unreachable.”
- V. Determining the Results
- A. Complete the Low- and Moderate-Income Worksheet. What is your estimated percent of low- and moderate-income residents? If your results are between 51 and 60 percent, does your data give you any reason to think that this is an over-estimate?
- VI. Documenting Your Effort
- A. Save the completed questionnaires -- preferably in a form that does not identify their responses.
 - B. Save a list of the respondents -- preferably in a form that does not identify their responses.
 - C. Save a list of your sampling procedures -- this includes your universe list, your original sample, your replacements, your sampling method, and your replacement method.
 - D. Save your data.

DISCUSSION OF SAMPLE SIZES

Samples of the sizes suggested [in Table B on Page 194] of this paper are intended to provide an estimate of the proportion of households that say they have low- and moderate-incomes that will be within +5 percent of the proportion that all households in the area would indicate if all were interviewed. Thus, if you interviewed 200 randomly selected households from a 350 household neighborhood and 70 percent indicated that they have low- and moderate-incomes, you could reasonably infer that if you interviewed all 350 households that between 65 and 75 percent of the households would say that they had low- and moderate-incomes.

In the survey being discussed in this paper, the confidence interval probably will be a little less than +5 percent. The method here is to estimate the proportion of people who are income-eligible, not the proportion of households. Following the procedures outlined here will result in sampling a fraction of people that is approximately equal to the fraction of households that would be sampled by following Table B (number of people sampled/total) number of people = number of households sampled/total number of households). Other things being equal, if you increase the size of your universe and maintain in the same sampling fraction, your confidence interval decreases.

Of course, in this application, other things may not be equal. By sampling households as a cluster for gathering data on individuals, we are departing from a purely random selection of individuals. Thus, the actual confidence can be calculated only after the data actually are collected and the variance on household size and income are analyzed. The actual confidence interval should be a little less than +5 percent. But we also included an “analysis” section in the paper to help in determining the extent to which it may be less than +5 percent.

APPENDIX D

Elderly Household Income Statistics by Community

HUD no longer calculates official numbers for elderly low- and moderate-income households by municipality. Therefore communities seeking CDBG funds for senior center projects must request updated elderly low- and moderate-income household data from DHCD prior to submitting an application. Please contact Karen Bresnahan at (617) 573-1441, or Karen.Bresnahan@state.ma.us to request this information.

APPENDIX E

Low and Moderate Income Limits

HUD issues income limit and rent level data annually. These data sets are readily available on their web page at the following addresses:

General data sets:

www.huduser.org/datasets/pdrdatas.html

Income limits:

www.huduser.org/datasets/il.html

Fair Market Rents (FMRs):

www.huduser.org/datasets/fmr.html

Applicants are encouraged to check these sites for the latest available data.

APPENDIX E

FY 2004 STATE LIST OF COUNTIES (AND NEW ENGLAND TOWNS)

IDENTIFIED BY METROPOLITAN AND NONMETROPOLITAN STATUS

U.S. Dept. of HUD
February 5, 2004

U.S. DEPT. OF HUD FY 2004 INCOME LIMIT AREA DEFINITIONS

STATE LIST OF COUNTIES (AND NEW ENGLAND TOWNS) IDENTIFIED BY METROPOLITAN AND NONMETROPOLITAN STATUS - MASSACHUSETTS

-----PMSA/MSA METROPOLITAN AREAS-----

-----T O W N S-----

MSA : Barnstable-Yarmouth, MA

MSA PART : Barnstable

Barnstable, Brewster, Chatham, Dennis, Eastham, Harwich,
Mashpee, Orleans, Sandwich, Yarmouth

PMSA: Boston, MA-NH

MSA PART : Bristol

MSA PART : Essex

Berkley, Dighton, Mansfield, Norton, Taunton city
Amesbury, Beverly city, Danvers, Essex, Gloucester city,
Hamilton, Ipswich, Lynn city, Lynnfield, Manchester,
Marblehead, Middleton, Nahant, Newbury, Newburyport city,
Peabody city, Rockport, Rowley, Salem city, Salisbury
Saugus, Swampscott, Topsfield, Wenham
Acton, Arlington, Ashland, Ayer, Bedford, Belmont,
Boxborough, Burlington, Cambridge city, Carlisle, Concord,
Everett city, Framingham, Holliston, Hopkinton, Hudson,
Lexington, Lincoln, Littleton, Malden city,
Marlborough city, Maynard, Medford city, Melrose city,
Natick, Newton city, North Reading, Reading, Sherborn,
Shirley, Somerville city, Stoneham, Stow, Sudbury, Townsend,
Wakefield, Waltham city, Watertown, Wayland, Weston
Wilmington, Winchester, Woburn city

MSA PART : Norfolk

Bellingham, Braintree, Brookline, Canton, Cohasset, Dedham,
Dover, Foxborough, Franklin, Holbrook, Medfield, Medway,
Millis, Milton, Needham, Norfolk, Norwood, Plainville,
Quincy city, Randolph, Sharon, Stoughton
Walpole, Wellesley, Westwood, Weymouth, Wrentham
Carver, Duxbury, Hanover, Hingham, Hull, Kingston,
Marshfield, Norwell, Pembroke, Plymouth, Rockland, Scituate,
Wareham

MSA PART : Suffolk

MSA PART : Worcester

Boston city, Chelsea city, Revere city, Winthrop
Berlin, Blackstone, Bolton, Harvard, Hopedale, Lancaster,
Mendon, Milford, Millville, Southborough, Upton

PMSA: Brockton, MA

MSA PART : Bristol

MSA PART : Norfolk

MSA PART : Plymouth

Easton, Raynham
Avon
Abington, Bridgewater, Brockton city, East Bridgewater,
Halifax, Hanson, Lakeville, Middleborough, Plympton, West
Bridgewater, Whitman

U.S. DEPT. OF HUD FY 2003 INCOME LIMITS AREA DEFINITIONS

STATE LIST OF COUNTIES (AND NEW ENGLAND TOWNS) IDENTIFIED BY METROPOLITAN AND NONMETROPOLITAN STATUS - MASSACHUSETTS

-----PMSA/MSA METROPOLITAN AREAS-----

-----T O W N S-----

MSA : Fitchburg-Leominster, MA			
	MSA PART	: Middlesex	Ashby
	MSA PART	: Worcester	Ashburnham, Fitchburg city, Gardner city, Leominster city, Lunenburg, Templeton, Westminster, Winchendon
PMSA: Lawrence, MA-NH			
	MSA PART	: Essex	Andover, Boxford, Georgetown, Groveland, Haverhill city, Lawrence city, Merrimac, Methuen, North Andover, West Newbury
PMSA: Lowell, MA-NH			
	MSA PART	: Middlesex	Billerica, Chelmsford, Dracut, Dunstable, Groton, Lowell city, Pepperell, Tewksbury, Tyngsborough, Westford
MSA : New Bedford, MA			
	MSA PART	: Bristol	Acushnet, Dartmouth, Fairhaven, Freetown, New Bedford city
	MSA PART	: Plymouth	Marion, Mattapoisett, Rochester
MSA : Pittsfield, MA			
	MSA PART	: Berkshire	Adams, Cheshire, Dalton, Hinsdale, Lanesborough, Lee, Lenox Pittsfield city, Richmond, Stockbridge
PMSA: Providence-Fall River-Warwick, RI-MA			
	MSA PART	: Bristol	Attleboro city, Fall River city, North Attleborough, Rehoboth, Seekonk, Somerset, Swansea, Westport
MSA : Springfield, MA			
	MSA PART	: Franklin	Sunderland
	MSA PART	: Hampden	Agawam, Chicopee city, East Longmeadow, Hampden, Holyoke city, Longmeadow, Ludlow, Monson, Montgomery, Palmer, Russell, Southwick, Springfield city, Westfield city, West Springfield, Wilbraham
	MSA PART	: Hampshire	Amherst, Belchertown, Easthampton, Granby, Hadley, Hatfield, Huntington, Northampton city, Southampton, South Hadley, Ware, Williamsburg
MSA : Worcester, MA-CT			
	MSA PART	: Hampden	Holland
	MSA PART	: Worcester	Auburn, Barre, Boylston, Brookfield, Charlton, Clinton, Douglas, Dudley, East Brookfield, Grafton, Holden, Leicester, Millbury, Northborough, Northbridge, North Brookfield, Oakham, Oxford, Paxton, Princeton, Rutland

U.S. DEPT. OF HUD FY 2003 INCOME LIMITS AREA DEFINITIONS

STATE LIST OF COUNTIES (AND NEW ENGLAND TOWNS) IDENTIFIED BY METROPOLITAN AND NONMETROPOLITAN STATUS - MASSACHUSETTS

-----PMSA/MSA METROPOLITAN AREAS-----

-----T O W N S-----

MSA : Worcester, MA-CT

COUNTY

MSA PART : Worcester

(cont'd) Shrewsbury, Southbridge, Spencer, Sterling,
Sturbridge, Sutton, Uxbridge, Webster, Westborough, West
Boylston, West Brookfield, Worcester city

-----NONMETROPOLITAN AREAS-----

NON MSA PART: Barnstable

NON MSA PART: Berkshire

Bourne, Falmouth, Provincetown, Truro, Wellfleet
Alford, Becket, Clarksburg, Egremont, Florida, Great
Barrington, Hancock, Monterey, Mount Washington, New
Ashford, New Marlborough, North Adams city, Otis, Peru,
Sandisfield, Savoy, Sheffield, Tyringham, Washington
West Stockbridge, Williamstown, Windsor

COUNTY : Dukes

NON MSA PART: Franklin

Ashfield, Bernardston, Buckland, Charlemont, Colrain,
Conway, Deerfield, Erving, Gill, Greenfield, Hawley, Heath,
Leverett, Leyden, Monroe, Montague, New Salem, Northfield,
Orange, Rowe, Shelburne, Shutesbury, Warwick, Wendell,
Whately

NON MSA PART: Hampden

NON MSA PART: Hampshire

Blandford, Brimfield, Chester, Granville, Tolland, Wales
Chesterfield, Cummington, Goshen, Middlefield, Pelham,
Plainfield, Westhampton, Worthington

COUNTY : Nantucket

NON MSA PART: Worcester

Athol, Hardwick, Hubbardston, New Braintree, Petersham,
Phillipston, Royalston, Warren

APPENDIX F
MANAGEMENT ORGANIZATION
Position Classification and Wage Schedule Guide

These figures on this page and the following pages represent the range of salaries paid by grantees for these positions state-wide over the past 5 years. This page is for overall costs, the following pages are by project type (e.g., housing rehabilitation, infrastructure). Salaries represent the state as a whole and no distinction is drawn for eastern versus western Massachusetts. Indirect rate (0-111%) requires a town-wide or agency-wide cost allocation plan in conformance with *OMB Circular A-87. The ranges are only a guide. Applicants should consult the appropriate town officials, and/or administering agency, to ensure consistency with local personnel policies.

Salary Costs	Range for 18 Months
Rehab Specialist	47,000 – 63,000
Secretary/Administrative Assistant	29,000 – 41,000
Finance Office/Bookkeeper	38,000 – 48,000
Program Manager (i.e., Housing, Economic Development, Infrastructure or Social Service Coordinators)	49,000 – 70,000
Director	51,000 – 76,000
Fringe Benefits (health, retirement, unemployment, etc.)	6-38% of salary costs
Non-Salary Costs	Range for 18 Months
Application Preparation	3,000 - 6,000
Memberships, subscriptions	200 - 1,000
Training, education	200 - 1,000
Travel	250 - 3,000
Accounting, Disbursement Service	500 - 1,500
Legal Services	1,000 - 5,000
Advertising	250 - 3,000
Reproduction, Printing	350 - 1,400
Communications	0 - 4,000
Supplies, Materials	1,200 - 3,000
Maintenance, Repairs	0 - 1,000
Audit	3,000 - 5,000
Computer and related equipment, software, internet, and network costs	800 - 6,000
Equipment	500 - 2,000
Professional Services/Management Consultants	2,000 - 30,000
Rent	0 - 5,000
Indirect Costs*	0 – 111%

HOUSING REHABILITATION: PROGRAM DELIVERY COST GUIDELINES												
Position	Program Size (# units)	18 mo F/T		Position FTE Total	Program FTE	Gen. Admin. FTE	Program Cost		General Admin		Total Salary	
		Salary										
		Minimum	Maximum				Minimum	Maximum	Minimum	Maximum	Minimum	Maximum
CD Director	15	\$51,773	\$76,055	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0
Program Manager	15	\$49,781	\$70,639	0.75	0.5	0.25	\$24,891	\$35,320	\$12,445	\$17,660	\$37,336	\$52,979
Rehab Specialist	15	\$47,288	\$63,051	0.5	0.5	0	\$23,644	\$31,526	\$0	\$0	\$23,644	\$31,526
Clerical/Bookkeeping	15	\$29,362	\$41,486	0.3	0.1	0.2	\$2,936	\$4,149	\$5,872	\$8,297	\$8,809	\$12,446
TOTAL PERSONNEL							\$51,471	\$70,994	\$18,318	\$25,957	\$69,788	\$96,951
CD Director	25	\$51,773	\$76,055	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0
Program Manager	25	\$49,781	\$70,639	1	0.5	0.5	\$24,891	\$35,320	\$24,891	\$35,320	\$49,781	\$70,639
Rehab Specialist	25	\$47,288	\$63,051	1	1	0	\$47,288	\$63,051	\$0	\$0	\$47,288	\$63,051
Clerical/Bookkeeping	25	\$29,362	\$41,486	0.5	0.2	0.3	\$5,872	\$8,297	\$8,809	\$12,446	\$14,681	\$20,743
TOTAL PERSONNEL							\$78,051	\$106,668	\$33,699	\$47,765	\$111,750	\$154,433
CD Director	35	\$51,773	\$76,055	0.25	0	0.25	\$0	\$0	\$12,943	\$19,014	\$12,943	\$19,014
Program Manager	35	\$49,781	\$70,639	1	0.5	0.5	\$24,891	\$35,320	\$24,891	\$35,320	\$49,781	\$70,639
Rehab Specialist	35	\$47,288	\$63,051	1	1	0.25	\$47,288	\$63,051	\$11,822	\$15,763	\$59,110	\$78,814
Clerical/Bookkeeping	35	\$29,362	\$41,486	1	0.3	0.7	\$8,809	\$12,446	\$20,553	\$29,040	\$29,362	\$41,486
TOTAL PERSONNEL							\$80,987	\$110,816	\$70,209	\$99,136	\$151,196	\$209,953
CD Director	40	\$51,773	\$76,055	0.5	0	0.5	\$0	\$0	\$25,887	\$38,028	\$25,887	\$38,028
Program Manager	40	\$49,781	\$70,639	1	0.5	0.5	\$24,891	\$35,320	\$24,891	\$35,320	\$49,781	\$70,639
Rehab Specialist	40	\$47,288	\$63,051	1.5	1.25	0.25	\$59,110	\$78,814	\$11,822	\$15,763	\$70,932	\$94,577
Clerical/Bookkeeping	40	\$29,362	\$41,486	1	0.3	0.7	\$8,809	\$12,446	\$20,553	\$29,040	\$29,362	\$41,486
TOTAL PERSONNEL							\$92,809	\$126,579	\$83,152	\$118,150	\$175,962	\$244,729

INFRASTRUCTURE: PROGRAM DELIVERY COST GUIDELINES

Position	Program Size	18mo. F/T Salary		Position FTE	Program FTE	Gen'l Adm FTE	Program Cost		General Admin		Total Salary	
		Minimum	Maximum				Minimum	Maximum	Minimum	Maximum	Minimum	Maximum
CD Director	Installation of new water/ sewer lines, 1000-2500 LF	\$51,773	\$76,055	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0
Program Manager	same	\$49,781	\$70,639	0.75	0.25	0.5	\$12,445	\$17,660	\$24,891	\$35,320	\$37,336	\$52,979
Local DPW Highway Dir. or consultant	same	\$47,288	\$63,051	0.5	0.5	0	\$23,644	\$31,526	\$0	\$0	\$11,822	\$31,526
Clerical/Bookkeeping	same	\$29,362	\$41,486	0.3	0	0.3	\$0	\$0	\$8,809	\$12,446	\$8,809	\$12,446
TOTAL PERSONNEL							\$36,089	\$49,185	\$33,699	\$47,765	\$57,966	\$96,951
CD Director	Upgrade existing water/sewer lines, 1000-2500 LF	\$51,773	\$76,055	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0
Program Manager	same	\$49,781	\$70,639	0.6	0.2	0.4	\$9,956	\$14,128	\$19,912	\$28,256	\$29,869	\$42,383
Local DPW/Highway Dir. or consultant	same	\$47,288	\$63,051	0.3	0.3	0	\$14,186	\$18,915	\$0	\$0	\$4,256	\$18,915
Clerical/Bookkeeping	same	\$29,362	\$41,486	0.3	0	0.3	\$0	\$0	\$8,809	\$12,446	\$8,809	\$12,446
TOTAL PERSONNEL							\$24,143	\$33,043	\$28,721	\$40,701	\$42,933	\$73,745
CD Director	Reconstruct streets, sidewalks; 500-1000 LF	\$51,773	\$76,055	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0
Program Manager	same	\$49,781	\$70,639	0.6	0.2	0.4	\$9,956	\$14,128	\$19,912	\$28,256	\$29,869	\$42,383
Local DPW/Highway Dir. or consultant	same	\$47,288	\$63,051				\$0	\$0	\$0	\$0	\$0	\$0
Clerical/Bookkeeping	same	\$29,362	\$41,486	0.3	0	0.3	\$0	\$0	\$8,809	\$12,446	\$8,809	\$12,446
TOTAL PERSONNEL							\$9,956	\$14,128	\$28,721	\$40,701	\$38,677	\$54,829

**SMALL OR MICRO LOAN FUNDS TECHNICAL ASSISTANCE
PROGRAM DELIVERY COST GUIDELINES**

Position	Prog. Size	18 mo. F/T Salary		Position FTE Total	Program FTE	Gen. Admin. FTE	Program Cost		General Admin		Total Salary	
		Minimum	Maximum				Minimum	Maximum	Minimum	Maximum	Minimum	Maximum
CD Director	10	\$51,773	\$76,055	0.15	0.1	0.05	\$5,177	\$7,606	\$2,589	\$3,803	\$7,766	\$11,408
Program Manager	10	\$49,781	\$70,639	1	0.8	0.2	\$39,825	\$56,511	\$9,956	\$14,128	\$49,781	\$70,639
Clerical/Bookkeeping	10	\$29,362	\$41,486	0.3	0	0.3	\$0	\$0	\$8,809	\$12,446	\$8,809	\$12,446
TOTAL PERSONNEL							\$45,002	\$64,117	\$21,353	\$30,376	\$66,356	\$94,493
CD Director	15	\$51,773	\$76,055	0.25	0.15	0.1	\$7,766	\$11,408	\$5,177	\$7,606	\$12,943	\$19,014
Program Manager	15	\$49,781	\$70,639	1.5	1.25	0.25	\$62,226	\$88,299	\$12,445	\$17,660	\$74,672	\$105,959
Clerical/Bookkeeping	15	\$29,362	\$41,486	0.75	0	0.75	\$0	\$0	\$22,022	\$31,115	\$22,022	\$31,115
TOTAL PERSONNEL							\$69,992	\$99,707	\$39,644	\$56,380	\$109,636	\$156,087
CD Director	20	\$51,773	\$76,055	0.25	0.15	0.1	\$7,766	\$11,408	\$5,177	\$7,606	\$12,943	\$19,014
Program Manager	20	\$49,781	\$70,639	2	1.75	0.25	\$87,117	\$123,618	\$12,445	\$17,660	\$99,562	\$141,278
Clerical/Bookkeeping	20	\$29,362	\$41,486	1	0	1	\$0	\$0	\$29,362	\$41,486	\$29,362	\$41,486
TOTAL PERSONNEL							\$94,883	\$135,027	\$46,985	\$66,751	\$141,867	\$201,778

PUBLIC FACILITIES: PROGRAM DELIVERY COST GUIDELINES

Position	Program Size	18mo. F/T Salary		Position FTE Total	Program FTE	Gen. Admin. FTE	Program Cost		General Admin		Total Salary	
		Minimum	Maximum				Minimum	Maximum	Minimum	Maximum	Minimum	Maximum
CD Director	Senior Ctr.: new construction	\$51,773	\$76,055	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0
Program Manager	same	\$49,781	\$70,639	1	0.25	0.75	\$12,445	\$17,660	\$37,336	\$52,979	\$49,781	\$70,639
Clerk of Works	same	\$47,288	\$63,051	0.75	0.75	0	\$35,466	\$47,288	\$0	\$0	\$35,466	\$47,288
Clerical/Bookkeeping	same	\$29,362	\$41,486	0.4	0	0.4	\$0	\$0	\$11,745	\$16,594	\$11,745	\$16,594
TOTAL PERSONNEL							\$47,911	\$64,948	\$49,081	\$69,574	\$96,992	\$134,522
CD Director	Senior Ctr.: rehab/expand	\$51,773	\$76,055	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0
Program Manager	same	\$49,781	\$70,639	1	0.25	0.75	\$12,445	\$17,660	\$37,336	\$52,979	\$49,781	\$70,639
Clerk of Works	same	\$47,288	\$63,051	0.75	0.75	0	\$35,466	\$47,288	\$0	\$0	\$35,466	\$47,288
Clerical/Bookkeeping	same	\$29,362	\$41,486	0.5	0	0.5	\$0	\$0	\$14,681	\$20,743	\$14,681	\$20,743
TOTAL PERSONNEL							\$47,911	\$64,948	\$52,017	\$73,722	\$99,928	\$138,670
CD Director	Barrier Removal: 1-3 proj. total constr. cost @\$300K	\$51,773	\$76,055	0	0	0	\$0	\$0	\$0	\$0	\$0	\$0
Program Manager	same	\$49,781	\$70,639	1	0.25	0.75	\$12,445	\$17,660	\$37,336	\$52,979	\$49,781	\$70,639
Clerk of Works	same	\$47,288	\$63,051	0.75	0.75	0	\$35,466	\$47,288	\$0	\$0	\$35,466	\$47,288
Clerical/Bookkeeping	same	\$29,362	\$41,486	0.5	0	0.5	\$0	\$0	\$14,681	\$20,743	\$14,681	\$20,743
TOTAL PERSONNEL							\$47,911	\$64,948	\$52,017	\$73,722	\$99,928	\$138,670

APPENDIX G

PRIMARY FEDERAL REGULATIONS

All activities shall be subject to and performed in accordance with the provisions of Title I of the Housing and Community Development Act of 1974 as amended (42 U.S.C. 5301 et seq., hereinafter "the Act"), HUD regulations in 24 CFR 570 Subpart I, 24 CFR Part 85 (as may be determined applicable by the Massachusetts CDBG Program), and any regulations, directives or guidelines as may be established by DHCD for the Massachusetts CDBG Program. Where appropriate, subrecipients must comply with these requirements.

All activities shall be conducted in accordance with all applicable laws, rules, regulations, ordinances, orders and requirements of the Commonwealth and the federal government including, but not limited to, the following:

1. **Title VI of the Civil Rights Act of 1964** (42 U.S.C. 2000d et seq.), and HUD regulations at **24 CFR Part 1**, which prohibit discrimination based on race, color, or national origin under any program or activity receiving federal financial assistance.
2. **Title VIII of the Civil Rights Act of 1968** (42 U.S.C. 3601 et seq., known as the Fair Housing Act), which prohibits discrimination based on race, color, religion, sex, handicap, familial status, or national origin in the sale, rental, financing, or brokering of housing; and **Federal Executive Order 11063**, as amended by **Executive Order 12259**, and as implemented by regulations at **24 CFR 107**, which prohibits such discrimination in the sale or rental of property which has received federal assistance.
3. **Section 109 of the Act**, as amended (42 U.S.C. 5309), which prohibits discrimination based on race, color, national origin, religion, or sex under any program or activity receiving assistance under the Act, as well as any anti-discrimination laws which are made applicable by Section 109 to such programs or activities, including the **Age Discrimination Act of 1975** (42 U.S.C. 6101 et seq.), which prohibits discrimination on the basis of age, and **Section 504 of the Rehabilitation Act of 1973** (29 U.S.C. 794), which prohibits discrimination based on handicap.
4. The **Davis-Bacon Act** (40 U.S.C. 276a - 276a-7), as supplemented by Department of Labor regulations at **29 CFR Part 5**, which provides that laborers and mechanics employed by the Contractor or subrecipients on construction projects (consisting of 8 or more units in the case of residential property) assisted under the Act shall be paid wages determined by the Secretary of Labor, provided that Davis Bacon shall not apply to "volunteers"; and the **Contract Work Hours and Safety Standards Act** (40 U.S.C. 327 et seq.), as supplemented by Department of Labor Regulations at **29 CFR Part 5**, which contains labor standards for work on contracts financed by federal grants. The Contractor shall include these requirements in agreements with subrecipients.
5. The **National Environmental Policy Act of 1969** (42 U.S.C. 4321 et seq.), and such other provisions of law which further the purposes of the **National Environmental Policy Act** as specified in **24 CFR Part 58**, entitled "**Environmental review procedures for entities assuming HUD environmental responsibilities**," and **24 CFR Part 50**, et al, entitled "**Protection and**

enhancement of environmental quality”, published as a Final Rule in the September 29, 2003 **Federal Register**, effective October 29, 2003.

6. The **Housing and Urban Development Act of 1968, Section 3** (12 U.S.C. 1701u), which requires that training and employment opportunities be made available to lower-income persons living in the community where a project assisted under the Act is located, and that contracting opportunities be made available to businesses located in or owned by persons living in such community. The Contractor shall include this requirement in agreements with subrecipients. The text of this clause is included in the Massachusetts CDBG Program Operations Manual.
7. **Title X of the Lead-Based Paint Poisoning Prevention Act** (42 U.S.C. 4831), which prohibits the use of lead-based paint in residential structures constructed or rehabilitated with federal assistance; **24 CFR Part 570.487(c)**, which requires the elimination as far as practicable, of the hazards of lead poisoning due to the presence of lead-based paint in any existing housing assisted with funds provided under this contract; and **at 24 C.F.R. Part 35, which became effective on September 15, 2000.**
8. Regulations at **24 CFR Part 44**, containing audit requirements for units of local government receiving federal financial assistance.
9. **The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970** (42 U.S.C. 4601 et seq.) and regulations at **49 CFR Part 24**, and **Section 104 (d) of the Act** and regulations at **24 CFR 570.488**, which require the Contractor to adopt policies and plans designed to minimize displacement of residents and businesses, and to provide relocation benefits and assistance.
10. Regulations at **49 CFR Part 24, Subpart B, Uniform Relocation Act**, governing the acquisition of real property for activities assisted under the Act.
11. **Federal Executive Order 11246**, as amended by Executive Order 11375, and implemented by Department of Labor Regulations at **41 CFR Chapter 60**, which require the Contractor to adopt equal employment practices and cooperate with the Secretary of Labor in assuring compliance by subrecipients. The Contractor shall include this requirement in agreements with subrecipients. In addition, for all subcontracts which are nonexempt as defined in 41 CFR 60-1.5 (generally, subcontracts in excess of \$10,000), the Contractor shall include in the agreement the "equal opportunity clause" set forth in 41 CFR 60-1.4(b) for construction contracts, and in 41 CFR 60-1.4(a) for all other contracts.
12. The **Copeland Anti-Kickback Act** (18 U.S.C. 874) as supplemented by Department of Labor regulations at **29 CFR Part 3**. The Contractor shall include this requirement in agreements with subrecipients.
13. **The American with Disabilities Act of 1990** (42 U.S.C. 12101 et seq.), which prohibits discrimination against disabled individuals in private and public employment, public accommodations, public transportation, government services, and telecommunications. The Contractor shall include this requirement in agreements with subrecipients.
14. **Section 102 of the Department of Housing and Urban Development Reform Act of 1989 as supplemented by HUD regulations at 24 CFR Part 12** which requires

applicants to a state, or to a unit of local government, for assistance from HUD to make a number of disclosures. See specific requirements under "Special Conditions" and Exhibit A below.

15. **Administrative Requirements.** The Contractor shall comply with the provisions of 24 CFR Part 85, "Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments", as follows:

- Part 85.20 Standards for Financial Management Systems
- Part 85.22 Allowable Costs citing OMB Circular A-87 requirements
- Part 85.25 Program Income
- Part 85.30 Budget/Program revisions
- Part 85.31,32,33 Changes in Real Property, Equipment & Supplies
- Part 85.43 Enforcement/Termination for Cause
- Part 85.50 Close-out

16. **Political Activity Prohibited Under the Hatch Act.** None of the services to be provided by the Contractor shall be used for any partisan political activity or to further the election or defeat of any candidate for public office. The Contractor shall adhere to the provisions of the Hatch Act (5 U.S.C. 1501 et seq.), which limits political activities by employees whose principal employment is in connection with an activity, which is financed in whole or in part by federal funds.

17. Regulations at **41 CFR 60-250**, implementing the Vietnam Veterans Act, which requires affirmative action obligations of Contractors and Subcontractors for Disabled Veterans and Veterans of the Vietnam Era.

18. **Conflict of Interest.** The Contractor shall adhere to the requirements of M.G.L. Chapter 268A and the HUD Conflict of Interest regulations at 24 CFR Part 570.489(h).

19. **Section 105 of the Housing and Community Development Act of 1974 (42 U.S.C. 5305)**, as amended by adding at the end of the following new subsection: (h) Prohibition of Use of Assistance for Employment Relocation Activities. Notwithstanding any other provision of law, no amount from a grant under section 106 made in fiscal year 1999 or any succeeding fiscal year may be used to assist directly in the relocation of any industrial or commercial plant, facility, or operation, from one area to another area, if the relocation is likely to result in a significant loss of employment in the labor market area from which the relocation occurs.

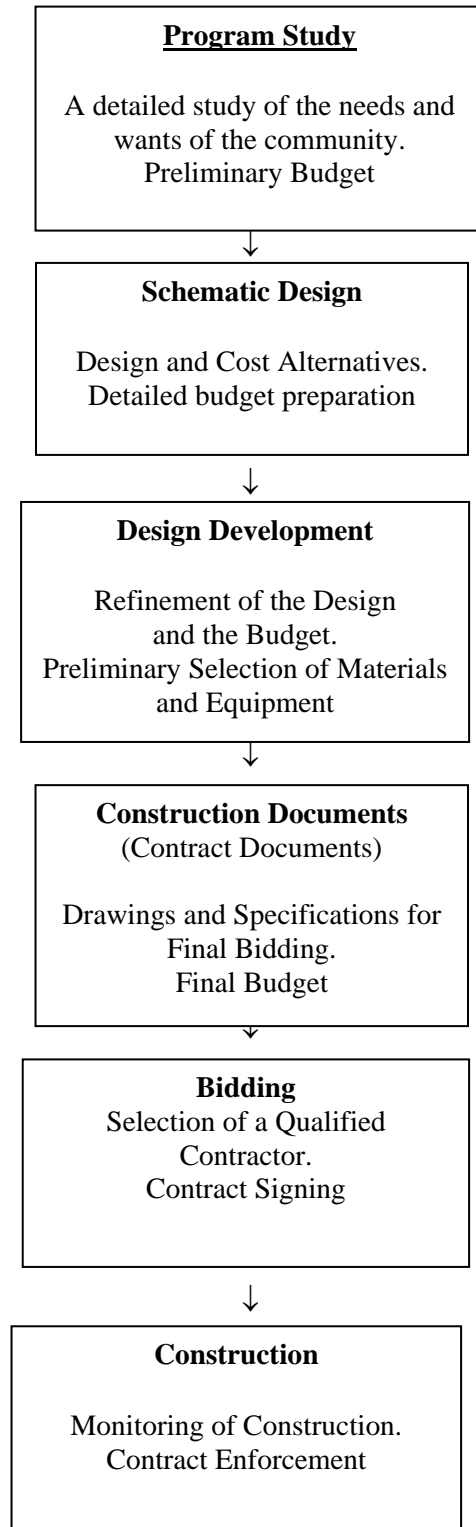
20. If Community Development Block Grant (CDBG) funds are being provided to primarily religious organizations, it must be in accordance with HUD's guidance on **Participation in HUD Programs by Faith-Based Organizations; Providing for Equal Treatment of all HUD Program Participants, Final Rule**, as published in the **Federal Register (Vol. 68, No. 189)** on September 30, 2003 on Pages 56396-56408, effective October 30, 2003.

APPENDIX H

LIST OF ENTITLEMENT COMMUNITIES IN MASSACHUSETTS

- | | |
|----------------|-----------------|
| 1. ARLINGTON | 19. MALDEN |
| 2. ATTLEBORO | 20. MEDFORD |
| 3. BARNSTABLE | 21. NEW BEDFORD |
| 4. BOSTON | 22. NEWTON |
| 5. BROCKTON | 23. NORTHAMPTON |
| 6. BROOKLINE | 24. PITTSFIELD |
| 7. CAMBRIDGE | 25. PLYMOUTH |
| 8. CHICOPEE | 26. QUINCY |
| 9. FALL RIVER | 27. SALEM |
| 10. FITCHBURG | 28. SOMERVILLE |
| 11. FRAMINGHAM | 29. SPRINGFIELD |
| 12. GLOUCESTER | 30. TAUNTON |
| 13. HAVERHILL | 31. WALTHAM |
| 14. HOLYOKE | 32. WESTFIELD |
| 15. LAWRENCE | 33. WEYMOUTH |
| 16. LEOMINSTER | 34. WORCESTER |
| 17. LOWELL | 35. YARMOUTH |
| 18. LYNN | |

Mass CDBG



APPENDIX I

Public Facilities Projects – Phases of Design

The diagram on the left represents the basic components in a public facility construction project. The definitions below are for schematic documents, design development plans and construction documents. *Design Development Plans are a threshold for communities applying to either CDF I or II for senior centers projects.* For other public facility projects, less than Design Development Drawings will result in points being deducted from the readiness to proceed question.

Schematic Documents

Schematic documents are a presentation of the overall concept of the project entailing all major elements of building and site design. The following should be considered; site plan that show the location of the building, general grading arrangement, surface drainage, site improvements, pedestrian and vehicular circulation, parking, and preliminary layouts for utility services. Scale plans of the building, wall sections (including foundations) and elevations sufficient to serve the intended work. There should be an outline specifications in sufficient detail to define the quality of materials to be used. An estimated project construction cost should be provided by an Architect or Engineer as a design professional familiar with the construction industry.

Design Development Plans

Design Development Drawings are beyond schematic documents and provide sufficient detail to establish firmly the features of the project. Plans and details should precisely illustrate the various rooms, auxiliary use areas, materials, and equipment as well as site and utility installations. The estimated project construction costs developed through the schematic documents should be confirmed by the design development drawings. An Architect/Engineer should prepare these documents.

Construction Document Phase (Bid Ready)

The construction documents shall constitute a presentation of the complete concept of the work including all major elements of the building and site design. The documents should be planned to promote economy in construction, maintenance and operation, and to comply with criteria established for the project and cost limitations. The bid documents shall set forth in detail and prescribe the work to be done by the construction specifications; the materials, workmanship, finishes and equipment required for the architectural, structural, mechanical, electrical and site work; and the necessary solicitation information.

Drawings shall include the following:

- Site plan showing the location and type of building
- Scale plans of the building.
- Wall sections, details, and elevations in sufficient to serve as a basis for a construction estimate.
- All other required architectural, civil, structural, mechanical and electrical documents necessary to complete the project.

APPENDIX J

Base-line Information Form for CDBG activities to prevent or eliminate conditions of slums or blight: Area Basis			
Documentation category	Specific Item	Numerical Response (# or %)	Identify on Target Area Map?
Total acreage of target area:			
Land uses as % total land area: <i>Estimate the percentage of the total target area by listed item.</i>	Commercial		
	Industrial		
	Residential		
	Transportation (roads)		
	Open Space		
	Public/Institutional & Other		
Distribution of buildings: <i>Indicate how many of the buildings are commercial, industrial, residential or public in the target area.</i>	Estimate # Commercial buildings		
	# Industrial buildings		
	# Residential buildings		
	# other buildings (Public/Institutional, & other)		
Building Condition Determination:	# Total Buildings in Target Area # Total Buildings Fair and Poor % Total Buildings Fair and Poor		
<i>Rank the # of Commercial buildings by condition</i>	# in Excellent Condition # in Good Condition # in Fair Condition # in Poor Condition		yes
<i>Rank the # of Industrial buildings by condition</i>	# in Excellent Condition # in Good Condition # in Fair Condition # in Poor Condition		yes
<i>Rank the # of Residential buildings by condition</i>	# in Excellent Condition # in Good Condition # in Fair Condition # in Poor Condition		yes
<i>Rank the # of Public/Institutional buildings by condition</i>	# in Excellent Condition # in Good Condition # in Fair Condition # in Poor Condition		yes

Documentation category	Specific Item	# or % Response	Identify on Map?
Roads	Total linear feet of roads		
	Total linear feet in deterioration		yes
	<i>Attach narrative indicating whether cosmetic or structural deterioration</i>		
Sidewalks	Total linear feet of sidewalks		
	Total linear feet of sidewalks in deterioration		yes
	<i>Attach narrative Indicating whether cosmetic or structural deterioration</i>		
Parking: Public or Private	# Parking areas, public or private		
	# Parking areas in deterioration		yes
	<i>Attach narrative indicating whether cosmetic or structural deterioration</i>		
Parks, Playgrounds or vacant, open space areas	# parks, playgrounds, open spaces		
	# parks, playgrounds, open spaces in deterioration		yes
	<i>Attach narrative indicating types of deterioration</i>		
Other public improvements: <i>Examples: sewer lines, lighting, landscape. List total amount; Estimate # or % in deterioration.</i>	List public improvement Total # Total %% in deterioration		yes
	<i>Attach narrative indicating type of deterioration</i>		
Vacancy and indicators of disinvestment	% vacant commercial units		
	% vacant industrial units		
	# vacant residential units		
	# boarded up, abandoned, condemned or foreclosed buildings		yes
Historic Resources	buildings on or eligible for listing on National Register		yes
Basic business data:	Estimate # of Businesses operating in the target area		
	Estimate # of Businesses that have left target area in the last 24 months		
	Estimate # of Business that have come into the target area in the last 24 months		

APPENDIX K

Green/Sustainable Space Building Guidance

US Green Building Council
110 Sutter Street, Suite 410
San Francisco, CA 94104
Phone: 415-445-9500 Fax: 415-445-9911
or
US Green Building Council
1015 18th Street, NW, Suite 508
Washington, DC 20036
Phone: (202) 82-USGBC or 828-7422 Fax: (202) 828-5110
info@usgbc.org
<http://www.usgbc.org/>

Environmental Building News - E Build Inc.
122 Birge Street Suite 30
Brattleboro, VT 05301
Phone: (802) 257-7300
Fax: (802) 257-7304
<http://www.buildinggreen.com/>

Building Environmental Science and Technology
PO Box 1107
Edgewater, MD 21037 USA
Phone (410) 867-8000,
TeleFax: (301) 889-0889.
info@energybuilder.com
<http://www.nrg-builder.com/>
<http://www.nrg-builder.com/greenbld.htm>

Energy Efficient Building Association (EEBA)
10740 Lyndale Avenue South, Suite 10W
Bloomington, MN 55420-5615
952.881.1098
952.881.3048 fax
<http://www.eeba.org/>
info@eeba.org

Sustainable Building Industry Council (SBIC)
1331 H Street, N.W., Suite 1000
Washington, DC 20005
Phone: (202) 628-7400/Fax: (202) 393-5043
<http://www.sbicouncil.org/>

Energy Efficient Rehab Advisor
Federal FY 2006 Massachusetts CDF/ME Program Application
Appendix

U.S. Department of Housing and Urban Development, Office of Policy Development and Research.

<http://rehabadvisor.pathnet.org/>

The EPA offers the Energy Star Label for Buildings.

U.S. Environmental Protection Agency

Climate Protection Partnerships Division

ENERGY STAR Programs Hotline & Distribution (MS-6202J)

1200 Pennsylvania Avenue, NW

Washington, DC 20460

Toll-free Hotline 1-888-STAR-YES (1-888-782-7937)

<http://www.energystar.gov/> (product specifications are under “products”)

http://www.energystar.gov/index.cfm?c=home_improvement.hm_improvement_index

U.S. Department of Energy

Boston Regional Office

JFK Federal Building, Suite 675

Boston, MA 02203

Tel: 617/565-9700

Fax: 617/565-9723

<http://www.eren.doe.gov/bro/>

<http://www.eren.doe.gov/buildings/>

NYC Department of Design and Construction

30-30 Thompson Avenue

Long Island City, NY 11101

Phone: (718) 391-1000

<http://www.ci.nyc.ny.us/html/ddc/>

The Center of Excellence for Sustainable Development

U.S. Department of Energy

Boston Regional Office

JFK Federal Building, Suite 675

Boston, MA 02203 <http://www.eren.doe.gov/bro/>

Tel: 617/565-9700

Fax: 617/565-9723

<http://www.sustainable.doe.gov/>

<http://www.eren.doe.gov/bro/>